

CHARTERED

RECEIVED

JUL 10 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

Re: Petition for Expedited Rulemaking to Establish Reporting Requirements and Performance and Technical Standards for Operations Support Systems, RM 9101

Pursuant to the Commission's June 10, 1997 Public Notice in the above-referenced matter, enclosed for filing are an original and four (4) copies of the Comments of Telco Communications Group, Inc., and a diskette containing the Comments in WordPerfect for Windows 5.1 format.

Very truly yours,

[Signature]

Counsel for Telco Communications Group, Inc.

cc: Bryan Rachlin
Janice M. Myles, Common Carrier Bureau (2 copies and diskette)
International Transcription Service (w/diskette)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUL 10 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Petition for Expedited Rulemaking)
To Establish Reporting Requirements and) RM 9101
Performance and Technical Standards for)
Operations Support Systems)
_____)

**COMMENTS OF TELCO COMMUNICATIONS GROUP, INC.
IN SUPPORT OF PETITION FOR EXPEDITED RULEMAKING**

Bryan Rachlin
Telco Communications Group, Inc.
4219 Lafayette Center Drive
Chantilly, Virginia 20151
(703) 631-5600 (Tel.)
(703) 803-3430 (Fax)

Joël Van Over
Michael R. Romano
Swidler & Berlin, Chtd.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500 (Tel.)
(202) 424-7645 (Fax)

Dated: July 10, 1997

TABLE OF CONTENTS

Summary	iii
I. THE COMMISSION CAN ASSERT JURISDICTION OVER OSS FUNCTIONS ON SEVERAL STATUTORY BASES	3
A. Jurisdiction Under Section 251 of the 1996 Act	3
B. Jurisdiction Under Title II of the Act and Section 271 of the 1996 Act	4
II. THE COMMISSION MUST REQUIRE EACH ILEC TO PUBLICLY DISCLOSE ALL INFORMATION RELATING TO HOW IT PROVIDES OSS FUNCTIONS FOR ITS INTERNAL OPERATIONS	6
A. To Effectively Enforce its Own Orders and the Statutory Nondiscrimination Standards, the Commission Must First Mandate Disclosure By the ILECs	6
B. CLECs Must Be Allowed to Play a Role in Monitoring Discrimination in the Provision of Access to OSS Functions	8
III. UNTIL THE ILECS' OSS INFORMATION HAS BEEN DISCLOSED AND STANDARDIZATION HAS BEEN ACHIEVED, THE COMMISSION SHOULD NOT ADOPT MINIMUM PERFORMANCE BENCHMARKS	9
A. Public Disclosure is an Absolute Prerequisite to the Development of Generally Applicable Minimum Performance Benchmarks	9
B. Standardized OSS Functions are an Absolute Prerequisite to, and Will Assist in, the Development of Generally Applicable Minimum Performance Benchmarks	11
IV. CONCLUSION	13

SUMMARY

The Comments of Telco Communications Group, Inc. (“Telco”) may be summarized as follows:

Statutory Sources of Jurisdiction: Telco agrees with the assessment by the Federal Communications Commission (“Commission”) in prior orders that Section 251 of the Telecommunications Act of 1996 (“1996 Act”) provides it with authority to regulate the Operations Support Systems (“OSS”) functions administered by incumbent local exchange carriers (“ILECs”). However, Telco also notes that several other statutory bases of jurisdiction exist. For example, Title II of the Communications Act of 1934, as amended by the 1996 Act, (“Act”) gives the Commission broad authority to monitor and prohibit certain cases of discrimination by one carrier against another. Section 271, on the other hand, gives the Commission a very specific grant of authority to examine whether a Bell Operating Company (“BOC”) is providing nondiscriminatory access to network elements as part of a comprehensive review of the BOC’s application to provide in-region interLATA telecommunications services.

Disclosure of OSS Information by ILECs: In order to enforce the nondiscrimination standards contained in the Act, the Commission must first order the disclosure of information relating to each ILEC’s OSS functions, including any internal performance benchmarks, standard intervals for performance, and monitoring procedures adopted by the ILEC. The Commission must ensure that such information is made publicly available and that the ILECs are required to supplement this information periodically to reflect any changes.

Prerequisites to the Establishment of National Performance Benchmarks: Before the Commission can actually impose minimum performance benchmarks for all ILECs, it needs time to review the information that ILECs will release with respect to their provisioning of access to OSS functions. Without such a review, any minimum standards adopted by the Commission could prove to be insufficient and ineffective, and leave ILECs with the opportunity to avoid their statutory obligation to provide nondiscriminatory access. Similarly, technical standardization of OSS functions must be achieved prior to implementation of national performance benchmarks. Only if all ILECs are using similar OSSs and thereby providing similar levels of access to OSS functions can a single nationwide standard truly measure whether a single ILEC is discriminating against its competitors. In the interim, the Commission and competitive local exchange carriers (“CLECs”) can use the information disclosed by each ILEC in response to the Commission’s order to enforce the statutory nondiscrimination standards against each ILEC on an individual case basis.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Expedited Rulemaking)	
To Establish Reporting Requirements and)	RM 9101
Performance and Technical Standards for)	
Operations Support Systems)	
_____)	

**COMMENTS OF TELCO COMMUNICATIONS GROUP, INC.
IN SUPPORT OF PETITION FOR EXPEDITED RULEMAKING**

Telco Communications Group, Inc., by undersigned counsel and pursuant to the Public Notice issued by the Federal Communications Commission ("Commission") on June 10, 1997, hereby files its Comments in support of the above-referenced LCI International Telecom Corp. and Competitive Telecommunications Association Petition for Expedited Rulemaking ("Petition").

Telco is one of the nation's 10 largest long distance companies. Through its subsidiaries, Telco is a rapidly growing, switch-based provider of long distance telecommunications products and services, targeting residential, commercial and carrier customers and is authorized by numerous state public service commissions to provide telecommunications services nationwide. Additionally, Telco's operating subsidiaries currently are authorized to provide competitive local exchange services in approximately 21 states and are seeking to obtain authority to provide competitive local exchange services in the remaining states.

Because Telco is an established presence in the long distance market, it has been able to develop a high level of internal efficiency with respect to the processing of service orders and its billing and collection operations. Through this previously-developed efficiency Telco is poised to

compete in the local market on the merits of its service offerings with minimal technical adjustments needed internally. However, as a new entrant to the local exchange market, Telco is also reliant to some extent upon the OSS services of ILECs for various functions, including order entry, provisioning, and maintenance and repair, in serving Telco's growing local customer base. As a result, Telco's efficiencies in its own internal support systems can be effectively undermined if an ILEC makes it unreasonably difficult to access its OSS. Telco contends that such unreasonable discrimination contravenes the pro-competitive purpose of the Telecommunications Act of 1996 ("1996 Act") and prior Commission orders on this issue, and accordingly, urges the Commission to convene a rulemaking proceeding to investigate whether ILECs are in fact providing nondiscriminatory access to OSS functions.

It should also be noted that Telco has historically focused on a residential market base through its 10XXX "dial-around" services and other offerings. This focus, however, makes Telco particularly vulnerable to harmful discrimination by ILECs in the provision of access to OSS. If a new Telco residential customer is made to wait at home because the ILEC delays in performing its provisioning or repair functions, or if the service ultimately provided is of poor quality, the residential customer will accuse its new carrier, Telco, rather than the ILEC whose inadequate service remains unseen by the customer. Telco therefore has a clear interest in the Commission's consideration of this Petition, and respectfully requests that the Commission grant the Petition and take action in accordance with the Comments offered herein.

I. THE COMMISSION CAN ASSERT JURISDICTION OVER OSS FUNCTIONS ON SEVERAL STATUTORY BASES.

A. Jurisdiction Under Section 251 of the 1996 Act

The Commission has previously determined that ILECs are required by both Section 251(c)(3) and (c)(4) to provide nondiscriminatory access to OSS functions.¹ As a result, competing carriers should be able “to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for network elements and resale services in substantially the same time and manner that an incumbent can for itself.”² Stated otherwise, the Commission has concluded that under Section 251, the ILEC must offer “equivalent access to OSS functions that an incumbent uses for its own internal purposes or offers to its customers or carriers.”³

Because Section 251(d)(1) directs the Commission to take “all actions necessary to establish regulations to implement the requirements of this section,”⁴ it seems apparent that Congress delegated to this Commission the authority to interpret and enforce the nondiscrimination requirements, and the Commission did so in the *Local Competition Order*. Thus, the Commission’s directives in that order and its reaffirmation of those findings in the *Second Order on Reconsideration* were well within the Commission’s power, and it would be justified in again taking

¹ *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, 11 FCC Rcd 15499, at 15763, ¶¶ 516-517 (1996) (“*Local Competition Order*”). See 47 U.S.C. §§ 251(c)(3) and (c)(4) (1996).

² *Local Competition Order*, 11 FCC Rcd at 15764, ¶ 518.

³ *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, Second Order on Reconsideration, FCC 96-476, at ¶ 9 (rel. Dec. 13, 1996) (“*Second Order on Reconsideration*”).

⁴ 47 U.S.C. § 251(d)(1) (1996).

action under Section 251 to enforce these statutory nondiscrimination mandates.

B. Jurisdiction Under Title II of the Act and Section 271 of the 1996 Act

Section 251, however, is not the sole source of statutory authority for Commission action in response to the Petition and the ongoing discrimination by ILECs in providing access to OSS. Prior to enactment of the 1996 Act, the Commission often used the broad authority granted by Sections 201 and 202 of the Act to prevent discrimination among common carriers.⁵ Section 201 of the Act mandates that “all charges, practices, classifications, and regulations for and in connection with any communication service, shall be just and reasonable, and any such charge, practice, classification, or regulation that is unjust or unreasonable is hereby declared unlawful.”⁶ Similarly, Section 202 of the Act prohibits “unjust or unreasonable discrimination in charges, practices, classifications, facilities, or services for or in connection with like communication service, directly or indirectly, by any means or device.”⁷

⁵ *Id.*, at §§ 201 and 202. *See, e.g., Applications of Chesapeake & Potomac Telephone Company of Virginia for Authority to Construct and Operate Limited Networks Consisting of Single Digital Termination Systems in the Digital Electronic Message Service*, File Nos. 15078-CDM,-P-82, 15079-CDM-P-82, 98 F.C.C. 2d 238, at ¶ 25 (1984) (ruling that Sections 201 and 202 requires that “all exchange carriers . . . provide reasonable and nondiscriminatory interconnection for all DEMS providers); *Regulatory Policies Concerning Resale and Shared Use of Common Carrier Services and Facilities*, Docket No. 20097, 60 F.C.C. 2d 261, at ¶4 (1976) (finding that Sections 201(b) and 202(a) apply to discrimination against other carriers as well as against end users); *Tropical Radio Telegraph Co.*, Docket No. 18372, 31 F.C.C. 2d 678, at ¶¶ 16-17 (1971) (rejecting an argument that Sections 201(b) and 202(a) do not address unreasonable or discriminatory relationships between common carriers).

⁶ 47 U.S.C. § 201(b) (1996).

⁷ *Id.*, at § 202(a).

Enactment of the 1996 Act should not limit the Commission's ability to exercise its corresponding powers under Sections 201 and 202 of the Act. Just as the Commission used these sections to open the interexchange market to competition in the 1970s and 1980s, the plain language of these sections continues to support Commission action today in addressing anticompetitive practices in the local exchange market. Thus, the overwhelming amount of evidence cited by LCI and CompTel in their Petition,⁸ together with the complaints of other CLECs,⁹ should prompt this Commission to exercise its authority under Sections 201 and 202 as well as Section 251, and accordingly, the Commission should examine whether ILEC practices in providing access to their OSSs violate the nondiscrimination standards contained in these sections.

In addition, Section 271 of the 1996 Act provides the Commission with limited jurisdiction to examine BOC provision of access to OSS functions in the context of a BOC's application to provide in-region interLATA services. Two essential provisions of the "competitive checklist" contained in Section 271 require the Commission to determine whether the BOC has provided nondiscriminatory access to unbundled network elements and made resale services available on reasonable and nondiscriminatory terms.¹⁰ Indeed, the purpose of Section 271 may only be served

⁸ See *Petition*, at 34-84.

⁹ See *Application of SBC Communications Inc. et. al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region InterLATA Services in the State of Oklahoma*, Evaluation of the United States Department of Justice, CC Docket No. 97-121, at 68 and 75 (filed May 16, 1997) ("DOJ Evaluation") (noting the problems that AT&T and MCI have had with entering Pacific Bell's market as a result of inefficient ordering processes, and also highlighting the disparity between the OSS functions provided by Southwestern Bell for its own retail operations and those it provides to CLECs).

¹⁰ 47 U.S.C. § 271(c)(2)(b)(ii) and (xiv) (1996).

if the Commission can establish whether a BOC has in fact discriminated against CLECs with respect to the BOCs' provision of unbundled elements and resale services, including the OSS processes associated with these items. The Department of Justice highlighted the importance of these nondiscriminatory provisions in recommending against Southwestern Bell's Section 271 application: "The checklist requirements of providing resale services and access to unbundled elements would be hollow indeed if the efficiency of -- or deficiencies in -- these 'wholesale support processes,' rather than the dictates of the marketplace, determined the number or quality of such items available to competing carriers."¹¹ Thus, the Commission also possesses limited jurisdiction in the context of Section 271 proceedings to review all information relating to a BOC's provisioning of OSS functions to itself and to other carriers.

II. THE COMMISSION MUST REQUIRE EACH ILEC TO PUBLICLY DISCLOSE ALL INFORMATION RELATING TO HOW IT PROVIDES OSS FUNCTIONS FOR ITS INTERNAL OPERATIONS.

A. To Effectively Enforce its Own Orders and the Statutory Nondiscrimination Standards, the Commission Must First Mandate Disclosure By the ILECs.

In its *Local Competition Order*, the Commission stated with clarity,

"[I]n order to comply fully with section 251(c)(3) an incumbent LEC must provide, upon request, nondiscriminatory access to operations support systems for pre-ordering, ordering, provisioning, maintenance and repair, and billing of unbundled network elements under section 251(c)(3) and resold services under section 251(c)(4). Incumbent LECs that currently do not comply with this requirement of section 251(c)(3) must do so as expeditiously as possible, *but in any event no*

¹¹ *Application of SBC Communications Inc. et. al. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region InterLATA Services in the State of Oklahoma*, Evaluation of the United States Department of Justice, CC Docket No. 97-121, at 26 (filed May 16, 1997) ("DOJ Evaluation").

*later than January 1, 1997.”*¹²

Despite the Commission’s clear guidance in this paragraph, numerous CLECs have had ongoing difficulty in obtaining access to OSS functions in the same manner as the ILEC provisions OSS for itself. The continuing problems in achieving parity with respect to OSS functions preclude effective competitive entry into the local exchange market, as customers who sign up with CLECs experience service and repair delay as a result of substandard provision of OSS interfaces by the ILEC.¹³ As this Commission stated in its *Local Competition Order*, “It is these [OSS] systems that determine, in large part, the speed and efficiency with which incumbent LECs can market, order, provision, and maintain telecommunications services and facilities. Thus, we agree with Ameritech that ‘operational interfaces are essential to promote viable competitive entry.’”¹⁴ Although the Commission declined to initiate enforcement action against non-complying ILECs in its *Second Order on Reconsideration* in December 1996, the deadline for compliance with the Commission’s order is now six months past, and it should be noted that the Commission reserved the right to initiate enforcement action “where circumstances warrant.”¹⁵ Given the circumstances involving substandard access to OSS functions presented to the Commission over the past several months, and the fact that ILECs have had a six-month “grace period” to comply with the Commission’s directives, Telco believes that the Commission has no choice but to act now in response to the Petition to enforce the requirements set forth in its *Local Competition Order* and the underlying

¹² *Local Competition Order*, 11 FCC Rcd at 15767, ¶ 525 (*emphasis added*).

¹³ *See, e.g., Petition*, at 34-84; *DOJ Evaluation*, at Appendix A.

¹⁴ *Local Competition Order*, 11 FCC Rcd at 15763, ¶ 516 (*citation omitted*).

¹⁵ *Second Order on Reconsideration*, at ¶11.

statutory standards.

Before the Commission can adopt national performance benchmarks as requested by the Petition, it must take the fundamental step of defining nondiscriminatory access to OSS functions. If the Commission is going to enforce the provisions of its *Local Competition Order* and the various nondiscrimination provisions of the Act in an effective manner, it must first order each ILEC to disclose, via public filings with the Commission, all information associated with its self-provisioning of OSS, including internal performance benchmarks, intervals for performance, and self-monitoring and self-reporting processes. Such information will be essential to the Commission and to competitors in determining whether the service being provided to CLECs meets the statutory nondiscrimination standards and the requirements promulgated in the Commission's orders.

B. CLECs Must Be Allowed to Play a Role in Monitoring Discrimination in the Provision of Access to OSS Functions.

The Commission should reject any requests by the ILECs to treat this OSS information as proprietary, just as it did in first ordering that OSS functions be made available as an unbundled network element.¹⁶ In order to enforce the statutory nondiscrimination standards and its related orders in an effective manner, the Commission must depend upon CLECs to monitor the level of service they receive from ILECs and to report instances of potential discrimination to the Commission. Without the OSS information that would be released in response to a Commission order in this proceeding, CLECs are unable to determine how the services they are receiving compare to the OSS functionalities that the ILEC provides for itself. Treating the OSS information as proprietary will prevent CLECs from discerning when discrimination has occurred, and thereby

¹⁶ See *Local Competition Order*, 11 FCC Rcd at 15766, ¶ 521.

undermine the very purpose of releasing such information in the first instance.

Similarly, in order for CLEC monitoring to be effective, the Commission must instruct ILECs to provide periodic updates to the OSS information they disclose as a result of this proceeding. Without periodic updates, a CLEC will have no way of knowing if and when an ILEC upgrades its service. As a result, an ILEC will have the incentive and the ability to improve its internal OSS efficiency for self-provisioning, while continuing to provide OSS functionalities to the CLEC at the previously-reported level of performance. The Commission should therefore mandate that ILECs publicly produce, on a regular basis, updated information relating to OSS performance benchmarks, intervals, and monitoring processes, so that this Commission and the CLECs can effectively monitor whether a particular ILEC is continuing to provide nondiscriminatory access to OSS functions.

III. UNTIL THE ILECS' OSS INFORMATION HAS BEEN DISCLOSED AND STANDARDIZATION HAS BEEN ACHIEVED, THE COMMISSION SHOULD NOT ADOPT MINIMUM PERFORMANCE BENCHMARKS.

A. Public Disclosure is an Absolute Prerequisite to the Development of Generally Applicable Minimum Performance Benchmarks.

While the Petition advocates, and indeed proposes, minimum nationwide standards for determining whether an ILEC has provided nondiscriminatory access,¹⁷ Telco submits that no individual or group possesses all the information that is necessary to develop such standards at this time. For this reason, the Commission must first mandate full and public disclosure of OSS information by the ILECs before it can tackle the task of developing generally applicable performance benchmarks. As a preliminary matter, the establishment of performance standards

¹⁷ See *Petition*, at Appendix A.

without any technical record to support them would be vulnerable to an attack that the standards were arbitrary and capricious in nature. Furthermore, the very idea of “nondiscriminatory access” requires that the Commission compare the access to OSS functionalities provided by an ILEC to a CLEC with the OSS functions provided by that ILEC to itself. Thus, in order to find discrimination, the Commission must analyze the actual self-provisioning of OSS functions, rather than some stand-alone performance standard that may or may not be comparable to the manner in which the ILEC provides OSS functions for itself.¹⁸ Finally, the Commission should consider the ramifications of inappropriately establishing minimum benchmarks for the provision of access to OSS functions. Theoretically, an ILEC could be in compliance with some minimum benchmark and still be providing better service to itself than to its competitors. Only by carefully analyzing the data that ILECs will provide in response to the Commission’s order can the Commission define nondiscriminatory access, and accordingly, determine the proper level of performance benchmarks, standard intervals, and monitoring procedures that should be applied to each ILEC’s provision of OSS functionalities.

¹⁸ Telco does not intend to pass judgment on the “Local Competition Users Group” standards at this time. Telco’s only objectives are to point out that the Petition does not present the factual and technical data underlying the formulation of these national standards, and that the standards cannot be reasonably examined without the context of information from each ILEC regarding its own provisioning of access to OSS functions.

B. Standardized OSS Functions are an Absolute Prerequisite to, and Will Assist in, the Development of Generally Applicable Minimum Performance Benchmarks.

On the other hand, the Commission should not hesitate in promoting an immediate transition to standardized OSS functions. As Telco prepares to offer local service on a nationwide basis, it is finding that it needs to repeatedly adjust its own OSS functions in response to the needs of different ILECs. As noted previously, Telco has already developed sophisticated support systems in many respects, and the costs associated with altering these systems for individual ILECs across the nation is prohibitive. Such artificial costs of entry, which hinder the ability of financially and technically qualified carriers like Telco to begin to provide service on a nationwide basis, undermine the pro-competitive purpose of the 1996 Act.

It should be noted that the standardization of OSS functions is a distinct concept from the development of OSS function performance benchmarks. Standardization, as Telco uses it here and as used in the Petition,¹⁹ refers to the technical design aspects of the systems that ILECs use to provide OSS functions. Performance benchmarks, on the other hand, measure the output of those systems. While the Commission should not undertake to define performance benchmarks at this point because of a lack of information on the topic, the Commission already has at its disposal a significant amount of research on standardization that has been conducted by industry consortia, such as the Ordering and Billing Forum and the Alliance for Telecommunications Industry Solutions. As discussed in the Petition, these organizations have made substantial progress toward

¹⁹ *Petition*, at 21.

arriving at standardization of OSSs.²⁰ Indeed, by mandating disclosure of all OSS information by ILECs, the Commission can greatly assist the efforts of these organizations by providing raw data on which OSS technologies are more practical and efficient.

Standardization will not only help reduce the costs of competitive entry, but it will also allow the Commission to finally adopt national benchmarks for performance. As noted above, the statutory standards of “nondiscrimination” would seem to direct the Commission to compare how an ILEC self-provisions OSS with the manner in which the ILEC provides the CLEC with access to OSS functions. Prior to standardization, different ILECs will be using different OSSs, and therefore they will presumably achieve different levels of performance both in self-provisioning and in providing access to competitors. If two ILECs self-provide different levels of service, how can discrimination against competitors be determined by a single standard for both ILECs? This does not mean, however, that the Commission cannot prosecute instances of discrimination prior to standardization. Instead, prior to standardization, the Commission must utilize the information that it will gain from the ILECs as a result of an order in this proceeding to monitor discrimination by each ILEC on the basis of that ILEC’s own data. When standardization has been implemented, the Commission may then attempt to define national minimum performance benchmarks and intervals for performance, because at that time, all ILECs will be using similar OSSs and presumably have the capacity to perform similarly in providing CLECs with access to OSS functions.

²⁰ *Id.*, at 22.

IV. CONCLUSION

Telco respectfully requests that the Commission act on the Petition for Expedited Rulemaking by first requiring ILECs to publicly disclose all information relating to their OSS functions, so that the Commission and CLECs can effectively define the parameters of nondiscriminatory access and use this information to enforce the statutory nondiscrimination standards against ILECs on an individual case basis. Simultaneously, the Commission should encourage further progress toward technical standardization of OSS functions, in order to reduce the costs of competitive entry and promote the ultimate goal of establishing national minimum performance benchmarks for all ILECs. Finally, after the Commission and CLECs have had the opportunity to review and analyze the data released by the ILECs, and after standardization has been completed, the Commission should adopt national performance benchmarks. For the above reasons, Telco respectfully submits that the Commission should grant the Petition for Expedited Rulemaking in accordance with the Comments made herein.

Respectfully submitted,



Joël Van Over
Michael R. Romano
Swidler & Berlin, Chtd.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500 (Tel.)
(202) 424-7645 (Fax)

Bryan Rachlin
Telco Communications Group, Inc.
4219 Lafayette Center Drive
Chantilly, Virginia 20151
(703) 631-5600 (Tel.)
(703) 803-3430 (Fax)

Dated: July 10, 1997